



PURPOSE OF STATEMENT

This Modern Slavery Act statement is made on behalf of Gordon Brothers Industries Limited. This disclosure is a modern slavery statement for the purpose of section 54 of the United Kingdom Modern Slavery Act 2015 and also addresses the key elements of the reporting requirements in section 16 of the Australian modern Slavery Act 2018 (Commonwealth) for the financial year ending 31 July 2020.

This Modern Slavery statement discloses Gordon Brothers Industries progress towards identifying and addressing modern slavery risks within our business and supply chain.

INTRODUCTION

Gordon Brothers Industries is committed to acting ethically in all our operations and throughout our supply chain, and this includes continually evolving how we can best integrate important environmental, social and governance (ESG) issues into our business processes to deliver better outcomes for our clients and society.

Gordon Brothers Industries conducts all business to high levels of ethical and professional standards and in accordance with relevant laws in the countries in which we operate or source goods and services (supply chain).

Gordon Brothers Industries is dedicated to mitigating the risk of modern slavery in its business and supply chains.

The term modern slavery is used to cover a broad range of exploitive practices including, but not limited to; slavery & servitude, forced labour, debt bondage, child exploitation and labour and other slavery-like practices including; human trafficking, forced marriage, deceptive recruiting and sexual offences.

Gordon Brothers Industries is a leading manufacturer of Industrial Refrigeration and ancillary plant within Australia.

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Gordon Brothers Industries firmly believes that the responsibility of addressing the risks of modern slavery extend beyond managing our supply chain. We engage with our employees, customers and our supply chain on a wide range of ESG issues, including modern slavery. Gordon Brothers Industries takes a proactive role in the broader industry to raise awareness and pursue higher standards.

These expectations are detailed and underpinned by various internal company policies, practice guidelines and statements, including but not limited to:

the Code of Ethics and Modern Slavery Policy, Corporate Social Responsibility Statement, Equal Employment Policy, Health, Safety and Environment Policy and Gordon Brothers position on Modern Slavery.

These expectations are further extended to our suppliers through the Gordon Brothers procurement practices.

UNDERSTANDING OUR SUPPLY CHAIN

In June 2019, Gordon Brothers established the role of a dedicated HSEQ Manager to further develop our management of HSEQ processes including risks management and mitigation. The role of the HSEQ Manager is also to identify modern slavery risk and supplier management (relating to same) across our business.

The focus is to plan, develop and implement a strategic road map of measures and controls to improve our approach to procurement and supply chain governance.

Gordon Brothers conducts a risk-based business-wide modern slavery assessment. This work engages representatives of all Gordon Brothers Industries business units and the basis of the assessment is to consider six core elements: governance oversight, supplier risk assessment processes, ongoing supplier due diligence processes, remediation processes, training, monitoring and reporting of modern slavery risks.

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These elements are used to develop our understanding of the areas of business with potential higher exposure to modern slavery risks. Additionally, further detailed evaluations of supply chains are performed after considering the supplier's service or goods category, geographical location and spend.

The outcomes of this risk-based assessment and analysis identified specific modern slavery risks within the Gordon Brothers Industries supply chain.

The review identified the following as Gordon Brothers Industries priority actions in addressing modern slavery risks:

- Communications and training for staff about how to identify and manage those risks;
- Enhancement of existing due diligence and review processes to identify and manage first tier suppliers' risks under new and existing contracts and extending these processes to all business units;
- Development of procedures and guidelines to help staff take appropriate action where modern slavery risks are suspected or identified, including how to engage with suppliers when a concern or incident is raised; and
- Formalising governance mechanisms including allocation of responsibilities, reporting and communication, complaints and grievance mechanisms, policy updates and appropriate review of decision making and management committees.

Understanding Gordon Brothers Industries broader supply chain (tier two and onwards) is a complex process. We are intending to further build our understanding of risks among our broader supplier networks through engagement with our tier one suppliers.

STEPS TAKEN

During the reporting period and continuing into 2020, the following steps will have been taken to improve Gordon Brothers Industries understanding of and capacity to identify and manage modern slavery risks:

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PROCUREMENT RISK ASSESSMENT & GUIDELINES

Guidelines will have been developed to assist employees with procurement responsibilities regarding how to assess risk when making procurement decisions, including supplier onboarding.

Likewise, a risk assessment tool and risk-based approach will have been developed for new suppliers. Due diligence processes will have been further developed to identify modern slavery risks in existing contracts and appropriately manage these risks through a regular review process and to assess the adequacy of controls in place.

UPDATED PROPOSAL AND CONTRACTUAL ARRANGEMENTS

Updated language specifically referring to modern slavery is being incorporated into new procurement proposal documentation and supplier contracts in priority areas of Gordon Brothers Industries. Updated contract terms seek confirmations from suppliers they are continuously taking steps to identify risks and prevent occurrence of modern slavery offences within their businesses. As part of the contract terms, suppliers are also required to notify us if they become aware of any modern slavery offences occurring in their business or own supply chains.

SUPPLIER CODE OF PRACTICE:

Gordon Brothers Industries, in conjunction with its business units, is developing and implementing a new “Supplier Code of Practice” detailing our policy and principle expectations of suppliers. This includes expectations that suppliers will investigate and mitigate the risk that workers may be subject to any form of modern slavery.

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It also stipulates that all work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, given reasonable notice. This additional detail, along with relevant modern slavery contract terms, will further enhance our approach to modern slavery in new supplier relationships.

RESPONDING TO AN INCIDENT OF MODERN SLAVERY:

A specific process has been established to respond to risks or instances of modern slavery identified in Gordon Brothers Industries supply chain. We will continue to develop our incident response processes and escalation path alongside the development of our supplier management framework.

COMMUNICATIONS AND TRAINING:

Awareness of modern slavery, its global impact and what we as an organisation are doing to address it continues to be rolled out across Gordon Brothers Industries. This is being achieved via targeted communications to Gordon Brothers Industries business units. This awareness will support employees with the knowledge and tools to play their part in helping to address modern slavery across our business operations and supply chain. Dedicated training is being delivered to all roles that have direct responsibility and accountability for procurement and supplier engagement.

While training to date has been focussed on priority areas of Gordon Brothers Industries, training modules are under development for all employees and will form part of Gordon Brothers Industries mandatory training.

Content for all training materials will be refreshed as required to improve employee understanding of modern slavery, their ability to identify potential modern slavery risks, be

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aware of appropriate engagement and escalation procedures as well as where to find further support and information.

MODERN SLAVERY KNOWLEDGE CENTRE:

A Modern Slavery information resource is in the process of being established on a share point platform which will be made accessible across all areas of the business. It will host a common set of resources, procurement guidelines and tools. This information resource will provide procedures for identifying and managing modern slavery risk.

A formal process for contacting suppliers and an analysis of their responses to a modern slavery self-assessment questionnaire will be initiated.

Once fully implemented, it is expected to:

- reduce the assessment, audit and reporting burden on common supply chains,
- improve data quality and integrity in relation to practices and associated risks disclosed by participating suppliers, and
- share knowledge on key risks within our supply chains through the provision of further education resources to participating suppliers.

FUTURE TASKS

Gordon Brothers Industries is focused on continuously improving our awareness and response to the risk of modern slavery in our business and supply chains. In order to further strengthen governance and controls around modern slavery risks, Gordon Brothers Industries is committed to;

- developing and extending modern slavery training to provide employees with awareness of relevant regulatory requirements and understanding of modern slavery risks,

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- continuously improving our existing procurement and risk management practices across all relevant business units, and ultimately beyond our initial focus on our tier one suppliers,
- analysing and understanding our supply chain more deeply, exploring options to work with suppliers and partners on an increasingly collaborative basis,
- developing measures to assess the effectiveness of the steps taken to improve Gordon Brothers Industries understanding and capacity to identify and address modern slavery risks,
- identifying lessons learnt and feedback from the modern slavery risk assessment tools applied since the last statement and evaluating the potential for wider adoption across other business units, and
- reviewing the requirements of any regulations and guidance issued in connection with the UK or Australian Modern Slavery Acts and incorporating an effective response within Gordon Brothers Industries risk management framework.

Signed for and on behalf of the Board of Gordon Brothers Industries Limited

Keith McLean
CEO, Gordon Brothers Industries

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